

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SOLAN HOLDING, BV, SYNEXXUS)	
COMPOSITES, et al.,)	
)	
Plaintiffs,)	
)	Case No. 1:22-cv-00786
)	
v.)	
)	
GREGORY GLAROS, SYNEXXUS INC., et)	
al.,)	
)	
Defendants.)	
_____)	

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Solan Holding, BV (“Solan”) and Patrick Coughlin (“Coughlin”), in their individual capacities and derivatively on behalf of Synexxus Composites, LLC (together, “Plaintiffs”), by and through their undersigned counsel, hereby submit the following list of trial exhibits they may use in the above-captioned matter. Plaintiffs reserve the right to amend or supplement this list as appropriate. This list does not include exhibits Plaintiffs may seek to introduce for purposes of rebuttal or impeachment, and Plaintiffs reserve the right to submit or introduce additional exhibits for the purposes of rebuttal and/or impeachment. Further, Plaintiffs hereby incorporate, as if fully set forth herein, all exhibits contained in Defendants’ Exhibit List, and reserve the right to use any such exhibit. Finally, this list does not include demonstrative or summary exhibits, which Plaintiffs reserve the right to use as appropriate to assist the trier of fact. Plaintiffs further reserve the right to add to or amend this disclosure as appropriate and/or necessary, including as contemplated by the Court’s Order dated April 7, 2023 (ECF No. 102).

<u>Exhibit</u>	<u>Title</u>	<u>Type</u>	<u>Start</u>	<u>End</u>
1	Patent 6,250,245 M-Shaped Boat Hull		SOLAN014267	SOLAN014280
2	Patent 6,314,903 M-Shaped Boat Hull		SOLAN014281	SOLAN014296
3	Patent 6,526,903 High Speed M-Shaped Boat Hull		SOLAN014319	SOLAN014341
4	Patent 7,093,553 Super High-Speed Multi-Hull Watercraft		SOLAN014342	SOLAN014358
5	Patent 8,683,936 B1 Powerboat Rooster Tail Depressor		SOLAN014236	SOLAN014252
6	Patent 6,868,798 B2 Powered Watercraft		SOLAN014253	SOLAN014266
7	Patent 6,983,713 B1 Powered Watercraft		SOLAN014297	SOLAN014318
8	Patent D595,204 S M-Shaped Boat Hull (design patent)		SOLAN014230	SOLAN014235
9	Conceptual Design Report		SOLAN016547	SOLAN016562
10	OFT Proposal Report		SOLAN015276	SOLAN015292
11	Contract		SOLAN009239	SOLAN009257
11.1	Mod 1		SOLAN009225	
11.2	Mod 2		SOLAN009238	
11.3	Mod 3		SOLAN009228	
11.4	Mod 4		SOLAN009231	
11.5	Mod 5 and Exhibits		SOLAN009206	SOLAN009224
11.6	Mod 6		SOLAN009195	SOLAN009205
11.7	Mod 7		SOLAN009230	
11.8	Mod 8		SOLAN009232	
11.9	Carderock Amendment		SOLAN009226	SOLAN009227
12	Letter re Mod 5 with SOW		SOLAN009212	SOLAN009219
13	PowerPoint		SOLAN016543	SOLAN016543
14	Affidavit		SOLAN014881	SOLAN014891
15	SYNEXXUS Project Shadow - Boat Proposal Submitted November 2018		SOLAN015670	SOLAN015756
15.1	M Ship Co. drawing #M80-03-1 dated 4/1/2005			
16	Burns Secure Note		SOLAN015385	SOLAN015392
17	Burns Patent Security Agreement		SOLAN014824	SOLAN014828
18	Mship Co. v. Ice Marine Complaint		SOLAN014900	SOLAN014915
19	MShipCo Patent Assignment		SOLAN015263	SOLAN015265
20	Synexxus Composites, LLC formation		SOLAN007496	SOLAN007498
21	Synexxus Composites Operating Agreement		PC_00163584	PC_00163607
22	Patrick Coughlin Employment Agreement		PC_00163331	PC_00163342
23	Appendix J IP project Shadow for Qatar Emiri navy and armed forces		SOLAN015660	SOLAN015669
24	FW: Synexxus Little Creek Stiletto CRADA	Email	PC_00119763	PC_00119764

24.1	190628 Synexxus CRADA.pdf	Attachment	PC_00119765	PC_00119789
24.2	190726 Synexxus Stiletto CRADA cover letter.pdf	Attachment	PC_00119790	PC_00119790
25	Re: Shadow Costs not in the BOM	Email	PC_00115303	PC_00115304
26	Update on SHADOW and Water	Email	PC_00064272	PC_00064273
27	Appendix J IP project Shadow for Qatar Emiri navy and armed forces		PC_00163274	PC_00163282
28	Org Chart Notes	Email	PC_00039762	PC_00039762
29	Integrity Pact Bank Guarantee	Email	PC_00008054	PC_00008054
30	CRADA 1 May 2019		PC_00163326	PC_00163330
31	FW: R: TAA	Email	PC_00106115	PC_00106123
32	Re: Request for Information	Email	PC_00019419	PC_00019420
33	Re: Slide decks from our call today?	Emails	PC_00103494	PC_00103501
34	Draft Pitch Deck	Email	PC_00036606	PC_00036606
34.1	Shadow Pitch Deck.pptx	Attachment	PC_00036607	PC_00036623
35	Re: Stiletto Site Visit	E-mail	PC_00035385	PC_00035387
36	WhatsApp Messages - Kerschbaumer and Glaros		SOLAN016134	SOLAN016210
37	Re: Latest questions from Patrick	E-mail	PC_00078894	PC_00078897
38	Investment Documents	Email	PC_00144066	PC_00144066
38.1	Investment by Patrick C.pdf	Attachment	PC_00144067	PC_00144088
39	Bridge Loan	Email	PC_00048270	PC_00048270
40	Re: SSA for Feb and March Pay	Email	PC_00161338	PC_00161339
40.1	SSA - Patrick Coughlin Feb and March Pay.pdf	Attachment	PC_00161340	PC_00161349
41	Re: Request relevant patent identification?	E-mail	PC_00148046	PC_00148048
41.1	00 Synexxus Patent Portfolio 23 Apr 2020.pdf	Attachment	PC_00148049	PC_00148183
42	Updated - Final Presentation for India Armed Forces	Email	PC_00088218	PC_00088218
42.1	Shadow Pitch India 23 April 2020.pdf	Attachment (via link)		
42.2	Shadow Pitch India 23 April 2020.ppt	Attachment (via link)		
43	Stock Subscription Agreement		PC_00136586	PC_00136595
44	Re: Employee Stock Options Plan	Email	PC_00106474	PC_00106476
44.1	SSA-Stock Options as Compensation Agreement 12 June 2020 - Haroon Change Signed.pdf	Attachment	PC_00106477	PC_00106485
45	Re: SSAs	Email	PC_00119295	PC_00119296
45.1	SSA-Patrick Coughlin June-Aug.pdf	Attachment	PC_00119297	PC_00119306

46	Subscription Agreement		PC_00163714	PC_00163731
47	Re: Stealthy Shadow "SS" way forward (2020-08-24 at 08:34 GMT-7)	E-mail	PC_00007742	PC_00007743
47.1	SHADOW Family of Stealth.pdf	Attachment	PC_00007744	PC_00007753
48	Stock Subscription Agreement		PC_00136576	PC_00136585
49	Appendixes	Email	PC_00105609	PC_00105609
49.1	Appendixs.zip	Attachment	PC_00105610	PC_00105740
50	Re: SYNEXXUS Advocacy Form	Email	PC_00135664	PC_00135683
50.1	Advocacy for India 13 Oct 2020.pdf	Attachment	PC_00135684	PC_00135690
52	OCT_DEC SSA	Email	PC_00141781	PC_00141781
52.1	SSA - Patrick Coughlin OCT-DEC.pdf	Attachment	PC_00141782	PC_00141791
53	Re: OCT-DEC SSA	Email	PC_00141778	PC_00141779
53.1	SSA OCT-DEC.pdf	Attachment	PC_00141780	PC_00141780
54	Assignment Agreement		SOLAN016213	SOLAN016219
55	FW: Insperity Financial Analysis	Email	PC_00117228	PC_00117228
55.1	Insperity Financials.pdf	Attachment	PC_00117229	PC_00117235
55.2	Independence Choice BAAG.pdf	Attachment	PC_00117236	PC_00117263
55.3	Synexxus-Executive Summary.pdf	Attachment	PC_00117264	PC_00117289
56	Org Chart Notes	Email	PC_00039762	PC_00039762
57	Integrity Pact Bank Guarantee	Email	PC_00008054	PC_00008054
58	Corrections to Appendix H, K, J and other documents	Email	PC_00007961	PC_00007962
59	RFP Response Folder	Email	PC_00007865	PC_00007865
60	Re: Corrections to Appendix H, K, J and other documents	Email	PC_00007961	PC_00007962
61	Sub: INTEGRITY PACT BANK GUARANTEE (IPBG)	Letter	SOLAN016234	SOLAN016235
62	Queries PDF response for submission	Email	PC_00008155	PC_00008155
62.1	Quereis Response to Technical Proposal WP_0910_SS_TEC 24 Aug 2021.pdf	Attachment	PC_00008156	PC_00008169
63	Re: SYNEXXUS Introduction	Email	PC_00158925	PC_00158939
63.1	Scanned Notarized Copies.pdf	Attachment	PC_00158940	PC_00158955
64	Re: Regarding IPBG to Indian Navy (Synexxus)	Email	PC_00086827	PC_00086828
65	WhatsApp Exchange, Gregory Glaros and Ravi Gadiraju		SOLAN016524	SOLAN016541
66	MVB IPBG		SOLAN015242	SOLAN015243
67	W. Craig Schmitz Affidavit		SOLAN015266	SOLAN015275
68	James Austin Shields Affidavit		SOLAN015224	SOLAN015228
69	Notary book		SOLAN015203	SOLAN015204

70	Re: Regarding IPBG to Indian Navy (Synexxus)	Email	PC_00086747	PC_00086755
71	Re: Regarding IPBG to Indian Navy (Synexxus)	Email	PC_00086735	PC_00086746
72	re asking Bill about IP transfer	Email exchange	PC_00086377	PC_00086378
73	September 2021 Synexxus, Inc. Purchase Order			
74	RE: Shadow class - Specification and GA	Email	DNV000317	DNV000328
75	RE_Shadow class - Specifications and GA	Email	DNV000310	DNV000315
76	Engineroom ventilation	Email	PC_00049080	PC_00049082
77	Introduction	Email	SOLAN003334	SOLAN003334
78	Drawing Package	Email	PC_00086388	PC_00086388
79	Progress report 1st Nov	Email	PC_00068408	PC_00068409
80	Zoom meeting invitation - Synexxus/performance LOC	Email	SOLAN002796	SOLAN002796
80.1	Zoom-Meeting.ics	Attachment	SOLAN002797	SOLAN002797
82	CONFIDENTIAL Fwd: Synexxus Composites Shadow Project	Email	SOLAN005751	SOLAN005752
82.1	Signed contract SS - 2021.pdf	Attachment	SOLAN005759	SOLAN005876
82.2	Shadow Class Future Business Case.pdf	Attachment	SOLAN005878	SOLAN005888
82.3	cumulative cash flow estimate - project shadow india.pdf	Attachment	SOLAN005890	SOLAN005890
82.4	estimated costs by sub-group.pdf	Attachment	SOLAN005892	SOLAN005892
82.5	SYNEXXUS Composites LLC Request for Funding.pdf	Attachment	SOLAN005894	SOLAN005894
83	Re: CONFIDENTIAL Fwd: Synexxus Composites Shadow Project	Email	SOLAN005748	SOLAN005750
84	Re: FW: Synexxus Composites Shadow Project	Email	SOLAN004516	SOLAN004518
85	Re: FW: Synexxus Composites Shadow Project	E-mail	SOLAN004279	SOLAN004284
85.1	PBK Executed NDA_SYNEXXUS_Composites_LLC.pdf	Attachment	SOLAN004285	SOLAN004288
86	Re: FW: Synexxus Composites Shadow Project	Email	SOLAN004270	SOLAN004274
86.1	PBK Executed NDA_SYNEXXUS_Composites_LLC[68].pdf	Attachment	SOLAN004275	SOLAN004278
87	Re: Synexxus Composites Shadow Project	E-mail	SOLAN004533	SOLAN004533
87.1	Signed contract SS - 2021.pdf	Attachment	SOLAN004534	SOLAN004651
87.2	Shadow Class Future Business Case.pdf	Attachment	SOLAN004652	SOLAN004662

87.3	cumulative cash flow estimate - project shadow india.pdf	Attachment	SOLAN004663	SOLAN004663
87.4	estimated costs by sub-group.pdf	Attachment	SOLAN004664	SOLAN004664
87.5	SYNEXXUS Composites LLC Request for Funding.pdf	Attachment	SOLAN004665	SOLAN004665
88	Re: FW: Synexxus Composites Shadow Project	Email	SOLAN004516	SOLAN004518
89	Re: FW: Synexxus Composites Shadow Project	Email	SOLAN004341	SOLAN004344
89.1	Multi Role High Speed Carbon Fiber Vessel Combined Drawings 6 Oct 2021.pdf	Attachment (via link)		
89.2	SYNEXXUS Patent Portfolio Combined.pdf	Attachment (via link)	SOLAN016236	SOLAN016523
89.3	SYNEXXUS Composites LLC Responses to Inquiry.pdf	Attachment	SOLAN004345	SOLAN004347
89.4	Monday-estimated costs by sub-group[40][6].pdf	Attachment	SOLAN004348	SOLAN004348
89.5	Monday-cumulative cash flow estimate - project shadow india[97][7].pdf	Attachment	SOLAN004349	SOLAN004349
89.6	211022 Synexxus CRADA finalized highlighted [67][93].pdf	Attachment	SOLAN004350	SOLAN004374
90	Forwarding responses to due diligence questions	Email	SOLAN005696	SOLAN005701
90.1	Multi Role High Speed Carbon Fiber Vessel Combined Drawings 6 Oct 2021.pdf	Attachment (via link)		
90.2	SYNEXXUS Patent Portfolio Combined.pdf	Attachment (via link)	SOLAN016236	SOLAN016523
90.3	SYNEXXUS Composites LLC Responses to Inquiry.pdf	Attachment	SOLAN005702	SOLAN005704
90.4	Monday-estimated costs by sub-group[40][6].pdf	Attachment	SOLAN005705	SOLAN005705
90.5	Monday-cumulative cash flow estimate - project shadow india[97][7].pdf	Attachment	SOLAN005706	SOLAN005706
90.6	211022 Synexxus CRADA finalized highlighted [67][93].pdf	Attachment	SOLAN005707	SOLAN005731
91	Re: FW: Synexxus Composites Shadow Project	Email	SOLAN005689	SOLAN005695
92	Re: FW: Synexxus Composites Shadow Project	Email	SOLAN005583	SOLAN005588
92.1	501_DSR_C_21-22_MULTI ROLE CARBON FIBER VESSEL PERT Chart.pdf	Attachment	SOLAN005589	SOLAN005596

92.2	SYNEXXUS Composites LLC Inquiry 2 4 Nov 2021.pdf	Attachment	SOLAN005597	SOLAN005597
92.3	Gregory Glaros Resume 2021.pdf	Attachment	SOLAN005598	SOLAN005598
92.4	Coughlin Patrick Resume.pdf	Attachment	SOLAN005599	SOLAN005599
93	Stiletto Pictures	Email	PC_00071557	PC_00071559
94	Marketing Material	Email	SOLAN001659	SOLAN001659
94.1	Shadow Pitch India 20 Oct 2021.pdf	Attachment (link)		
94.2	Shadow Class Future Business Case.pdf	Attachment (link)		
94.3	Multi Role Carbon Fiber Vessel Manufacturing Review 6 Oct 2021.pdf	Attachment (link)		
94.4	Clarification Questions CONOPS 11 Nov 2019.pdf	Attachment (link)		
95	Discovery Responses from Sterne Kessler			
96	M80-01-01 MS80-I-Hull&Deck-2D Lines			
97	M80-02-01 OutboardProfile&DeckPlan (1)			
98	M80-03-02 InteriorArrangementPlanView			
99	M80-07-01 MachyGeneralArrangement			
100	SP1856-0002 I Hull LAMINATE-SHEET 1			
101	SP1856-0002 I Hull LAMINATE-SHEET 2			
102	086 Document Register 21-11-21			
103	086-101-01 P1 - Standard Notes			
104	086-101-02 P2 - Structural GA			
105	086-110-01 PA - Hull Laminates			
106	TR1856-6002 A M-SHIP 80 ANALYSIS SUMMARY			
107	TR1856-6003 B M-SHIP 80 LOAD CASE SUMMARY			
108	TR1856-6004 A M-SHIP 80 SKIRT DESIGN SUMMARY			
109	TR1856-6005 A M-SHIP GLOBAL TORSION STUDY			
110	Architectural and Engineering Drawings for Stiletto and Project Shadow			
111	Bank Schedule - DRAFT		SOLAN007554	SOLAN007554
112	All deposition transcripts and videos			

113	Final Architectural and Engineering Drawings from M Ship Co.			
114	RE -- RE- Bank Guaranty - Synexxus Composites.eml	Email	PC_00012365	PC_00012366
114.1	10-31-21 Multi Role Carbon Fibre Vessel Progress Report	Attachment (link)		
114.2	Bank Guaranty - Synexxus Composites.eml	Attachment	PC_00012367	PC_00012371
115	Re: November Status Update for 501/DSR/C/21-22/Multi Role Carbon Fiber Vessel	Email	SOLAN005564	SOLAN005565
115.1	01 Multi Role Carbo Fiber Vessel Progress report 1-30 Nov 2021	Attachment	SOLAN005566	SOLAN005573
116	Re: Synexxus Composites / PNC Docs	Email	PC_00142578	PC_00142578
116.1	PERFORMANCE CUM Warranty Bank Guarantee 8 Nov 2021[99].docx	Attachment	PC_00142579	PC_00142580
116.2	Signed contract SS - 2021.pdf;	Attachment	PC_00142581	PC_00142698
116.3	INDIA TAA Approved with PROVISOS and Cover Letter Aug 2020[2].pdf	Attachment	PC_00142699	PC_00142709
117	Re: Compliance Questions - Final	Email	PC_00147297	PC_00147300
117.1	Responses to PNC Queries 7 Dec 2021[77].docx	Attachment	PC_00147301	PC_00147306
117.2	Files associated with responses	Attachment (link)		
118	Re: Series B Pro Forma	Email	PC_00082163	PC_00082165
119	Investor Prospectus	Email	PC_00115784	PC_00115785
119.1	Investment Prospectus 21 Dec 2021.pdf	Attachment	PC_00115786	PC_0115790
119.2	SSA Joe Rodriguez - Glaros.docx	Attachment	PC_00115793	PC_00115799
119.3	SSA Joe Rodriguez - Coughlin.docx	Attachment	PC_00115800	PC_00115806
120	Short term note	Email	SOLAN005330	SOLAN005330
120.1	20211220 Solan-Synexxus 1M Loan Note.docx	Attachment	SOLAN005331	SOLAN005333
121	Re: Short term note	Email	SOLAN005323	SOLAN005324
121.1	20211220 Solan-Synexxus 1M Loan Note [49].pdf	Attachment	SOLAN005325	SOLAN005327
122	Fwd: [EXTERNAL] Final quote and deposit invoice for Multi-Role tooling	Email	SOLAN005477	SOLAN005481
123	William Burns Employment Agreement		SOLAN009270	SOLAN009272
124	Response to Message Received January 12 2022.doc	Email	PC_00034847	PC_00034848

124.1	STAGE II DELIVERABLES.zip	Attachment (link)	SOLAN0013467	SOLAN0014140
125	Re: 2M conversion document	Email	PC_00037286	PC_00037287
126	1-16-23 Letter from G. Glaros to India			
127	7-27-22 Letter from Glaros to India re breach			
128	7-27-22 Letter from Glaros to India re default			
129	8-2-22 Letter from India to Synexxus Composites			
130	3-25-22 Letter from India re IPBG			
131	Stage I Completion Certificate		PC_00039720	PC_00039720
132	Textron Systems Canada PO		PC_00050144	PC_00050144
133	Re: SBA Meeting	Email	PC_00056758	PC_00056760
134	Pantheon Integrated Solutions PO		PC_00101939	PC_00101939
135	Pantheon Integrated Solutions PO		PC_00101946	PC_00101946
136	Purchasing and Receipt Flow		PC_00102279	PC_00102286
137	Stock Subscription Agreement		PC_00108590	PC_00108599
138	Teledyne Flir Surveillance, Inc. PO		PC_00133821	PC_00133821
139	Stock Subscription Agreement		PC_00136556	PC_00136565
140	Teledyne Flir Surveillance, Inc. PO		PC_00138690	PC_00138690
141	Out of Court Debt Restructuring	Email	PC_00138995	PC_00138996
142	Stock Subscription Agreement		PC_00163455	PC_00163476
143	Re: Termination	Letter	PC_00163616	PC_00163616
144	Screenshots		PC_00163617	PC_00163617
145	Composite Builders Statement No. 1066		PC_00163704	PC_00163704
146	Outstanding Synexxus Composite Reimbursable for Patrick Coughlin		PC_00163757	PC_00163757
147	Chase Confirmation		PC_00163758	PC_00163758
148	Enterprise Rental Invoice		PC_00163759	PC_00163760
149	Enterprise Rental Invoice		PC_00163761	PC_00163762
150	Gerald R. Ford Museum Receipt		PC_00163763	PC_00163767
151	Southwest Airlines Receipt		PC_00163768	PC_00163772
152	Southwest Airlines Receipt		PC_00163773	PC_00163782
153	AMEX Travel Receipt		PC_00163783	PC_00163790
154	Text Messages between Glaros and Coughlin		PC_00163791	PC_00163792
155	Text Messages between Glaros and Coughlin		PC_00163793	PC_00163793
156	Text Messages between Glaros and Coughlin		PC_00163794	PC_00163795
157	SSA Signature Page		PC_00163796	PC_00163796
158	Stock Subscription Agreement		PC_00163797	PC_00163818

159	Stock Subscription Agreement		PC_00163819	PC_00163828
160	SSA Signature Page		PC_00163829	PC_00163829
161	Stock Subscription Agreement		PC_00163830	PC_00163838
162	Stock Subscription Agreement		PC_00163840	PC_00163849
163	SSA Signature Page		PC_00163850	PC_00163850
164	Stage Completion Certificate - Stage I		PC_00163851	PC_00163852
165	Stock Subscription Agreement		PC_00163853	PC_00163862
166	CRADA from Carderock			
167	Services Agreement from Elliot Antokas			
168	Services Agreement attached to Defendants' Response to Motion for Summary Judgment in Maryland action			
169	Re: Short term note for payroll	Email	SOLAN014453	SOLAN014453
169.1	Convertible Promissory Note	Attachment	SOLAN014454	SOLAN014456
170	Stiletto LLIS Proposal		SOLAN016212	SOLAN016212
171	M Ship Co Letter		SOLAN016211	SOLAN016211
172	Pats Wishlist for success and good times	Email	SOLAN004492	SOLAN004493
173	Re: Synexxus Composite - State Bank of India Guarantee [20220327IE00878]	Email	PC_00070935	PC_00070944
174	EXTERNAL: RE: Synexxus Composites, LLC	Email	SOLAN001691	SOLAN001692
174.1	Entity Doc.Authorities.pdf	Attachment	SOLAN001693	SOLAN001724
175	Subj: Receiving LC and Amendment to Waive Bank Guarantee	Letter	SOLAN016544	SOLAN016545
176	Subj: Delinquency in Opening of Letter of Credit (LC)	Letter	SOLAN016542	SOLAN016542
177	JP Morgan Bank Statements			
178	Re Compliance Questions	Email	PC_00147307	PC_00147309
178.1	BIO Synexxus 2021	Attachment	PC_00147310	PC_00147330
178.2	Lien Release Information	Attachment	PC_00147331	PC_00147337
178.3	Solan Synexxus Convertible Note	Attachment	PC_00147338	PC_00147340
178.4	Attachment - Synexxus IP Assignment Agreement	Attachment	PC_00147341	PC_00147347
178.5	CRADA finalized highlighted	Attachment	PC_00147348	PC_00147372
178.6	Annexure III	Attachment	PC_00147373	PC_00147385
178.7	India TAA approved with provisos and Cover letter Aug 2020	Attachment	PC_00147386	PC_00147396
178.8	Composite Builders Services Agreement	Attachment	PC_00147397	PC_00147426
178.9	Chase Bank September 2021	Attachment	PC_00147427	PC_00147428
178.10	Chase Bank Oct 2021	Attachment	PC_00147429	PC_00147430
178.11	Chase Bank Nov 2021	Attachment	PC_00147431	PC_00147434
178.12	Responses to Queries	Attachment	PC_00147435	PC_00147440

179.00	May 1 2019 CRADA		PC_00163326	
180	EXTERNAL: Re: Western Michigan Community Bank Statement	Email	PNC_0000441	PNC_0000444
181	EXTERNAL: Re: Western Michigan Community Bank Statement	Email	PNC_0000388	PNC_0000390
182	Gregory Glaros Affidavit	Affidavit		
183	Operating Agreement	Attachment		
184	Gregory Glaros 2nd Affidavit	Affidavit		
185	Gregory Glaros 3rd Affidavit	Affidavit		
186	Appendix G: Intellectual Property Rights - Republic of India Navy and Armed Forces			
187	Re: Stiletto Site Visit	Email	PC_00035385	PC_00035387
188	Letter		SOLAN009189	
189	Letter		SOLAN009191	
190	Defendants' Expert Designation			
191	Dr. Jaye Falls Expert Report			
192	DNV Class Approved and Reviewed Drawings - Approved			
193	DNV Class and Reviewed Drawings - For Information			
194	DNV Letter re: GU7355-802/A			
195	Fwd: Notice of Material Breach	Email	SOLAN003621	SOLAN003621
195.1	Synexxus Notice of Default.pdf	Attachment	SOLAN003622	SOLAN003622
195.2	SynexXXusSuperSS as of 7.19.22-1.xlsx	Attachment	SOLAN003623	SOLAN003623
195.3	SyneXXUus Stmt 7.19.22.pdf	Attachment	SOLAN003624	SOLAN003624
195.4	I-Syn-10 July.pdf	Attachment	SOLAN003625	SOLAN003625
195.5	I-Syn-9 June.pdf	Attachment	SOLAN003626	SOLAN003626
196	Services Agreement Questions	Email	SOLAN008669	SOLAN008669
197	RE: Services Agreement Questions	Email	SOLAN008253	SOLAN008254
197.1	Statement of Work.pdf	Attachment	SOLAN008255	SOLAN008256
197.2	Statement of Work.docx	Attachment	SOLAN008257	SOLAN008258
198	RE: Synexxus - Holding from Dutch BV company	Email	SOLAN007584	SOLAN007585
199	QBO Access	Email	SOLAN007581	SOLAN007581
200	Re: Composite Builders Funds	Email	SOLAN014776	SOLAN014778
201	Amicable Settlement	Email	SOLAN014376	SOLAN014376
202	8/2/22 Letter from India		SOLAN007542	SOLAN007542
203	8/1/22 Letter from India		SOLAN007537	SOLAN007537
204	Re: Accounts Payable	Email	SOLAN007611	SOLAN007612

Dated: April 19, 2023

Respectfully submitted,

/s/ Kraig Jennett

Kraig D. Jennett (VSB No. 93246)

CLARK HILL PLC

1001 Pennsylvania Ave. NW, Suite 1300 South
Washington, DC 20004

Telephone: 202-640-6657

Facsimile: 202-552-2377

kjennett@clarkhill.com

rduncan@clarkhill.com

*Attorneys for Plaintiffs Patrick Coughlin and Solan
Holding BV*

/s/ Blair Preiser

Blair T. Preiser (admitted *pro hac vice*)

Daniel P. Lynch (admitted *pro hac vice*)

THE LYNCH LAW GROUP, LLC

501 Smith Drive, Suite 3

Cranberry Township, PA 16066

Telephone: (724) 776-8000

Facsimile: 724-776-8001

bpreiser@lynchlaw-group.com

dlynch@lynchlaw-group.com

*Attorneys for Plaintiffs Solan Holding BV and
Synexus Composites, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of Court and served via ECF on all counsel of record registered to receive service via the Court's CM/ECF system.

/s/ *Kraig D. Jennett*

Kraig D. Jennett, Esq. (VSB No. 93246)